

Richard M. Seltzer
COHEN, WEISS AND SIMON LLP
900 Third Avenue, 21st Floor
New York, New York 10022-4869
(212) 563-4100

*Counsel for the UAW, USW and
Workers United*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
SEARS HOLDING CORPORATION, <i>et al.</i> ,	:	Case No.: 18-23538 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
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NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that pursuant to Rules 2002 and 9010(b) of the Rules of Bankruptcy Procedure, and 11 U.S.C. §1109(b), the undersigned attorney appears for the International Union, UAW (“UAW”), United Steelworkers (“USW”), and Workers United

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SRC Sparrow 1 LLC (None); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); SRC Sparrow 2 LLC (None); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); SRC O.P. LLC (None); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); SRC Facilities LLC (None); and SRC Real Estate (TX), LLC (None). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

(“WU”) as noted below, creditors and parties in interest in this case, and requests that all notice given or required to be given in this action and all related actions, be given and served upon the following:

Richard M. Seltzer
COHEN, WEISS AND SIMON LLP
900 Third Avenue, 21st Floor
New York, New York 10022-4869
Telephone: (212) 356-0219
Facsimile: (646) 473-8219
Email: rseltzer@cwsny.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers, whether formal or informal, *ex parte* or on notice, written or oral, referred to in the Bankruptcy Rules and Code sections specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier or otherwise, which affect or seek to affect in any way any rights or interests of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive the right of UAW, USW or Workers United to have final orders in noncore matters entered only after *de novo* review by a District Judge; or the right to trial by jury in any proceeding related to this case; or the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or to adjudicate rights in other applicable forums, or any other rights, claims, actions, defenses, setoffs, or recoupments to which these entities are or may be entitled under agreements, in law or in equity, all of which rights are expressly reserved.

Dated: November 7, 2018
New York, New York

Respectfully submitted,

By: /s/ Richard M. Seltzer
Richard M. Seltzer
COHEN, WEISS AND SIMON LLP
900 Third Avenue, 21st Floor
New York, New York 10022-4869
(212) 563-4100

*Counsel for UAW, USW and Workers
United*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November 2018, a true and correct copy of the above Notice of Appearance and Request for Notice was served by electronically filing it with the Court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ Richard M. Seltzer
Richard M. Seltzer